

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

**AMANDA SISNEROS, Individually, as Mother
and Next Friend of Bryhanna Martinez and
Stephen Martinez, minors; and as Personal
Representative of the ESTATE OF
DAVID SISNEROS, Deceased,**

Plaintiff,

vs.

No. CV. 04-00137 WJ/RLP

**SHAWN P. BECK, JOSEPH CORIZ,
BENJIE MONTAÑO, RAY SISNEROS, JR.,
GREG SOLANO and THE BOARD OF
COUNTY COMMISSIONERS OF SANTA FE
COUNTY, NEW MEXICO,**

Defendants.

JOINT MOTION FOR APPROVAL OF SETTLEMENT

COME NOW the parties hereto, by and through their respective counsel, below-listed, and jointly move this Court for the entry of an order approving the settlement in the above-referenced cause. In support of this motion, the parties state:

1. The parties hereto have entered into a tentative settlement regarding all claims which Plaintiff Amanda Sisneros, individually and as Personal Representative of the Estate of David Sisneros, deceased, and as Mother and Next Friend of Bryhanna Martinez and Stephen Martinez (hereinafter referred to as “Plaintiffs”) may have against Defendants Shawn P. Beck, Joseph Coriz, Benjie Montano, Ray Sisneros, Jr., Greg Solano and the Board of County Commissioners of Santa Fe County, New Mexico (hereinafter referred to as “Defendants”). The parties agree that the settlement is fair, reasonable and in the best interests of all concerned.

2. Because one of the statutory beneficiaries of the proceeds of this settlement-- Justice Vasquez-- is a minor, it is appropriate that the Court review and approve the settlement. The parties will be submitting to the Court a report from the Guardian ad Litem documenting the terms and conditions of the settlement, its reasonableness, fairness and appropriateness. The parties will also submit to the Court a Release and Settlement Agreement which the parties have approved.

WHEREFORE, the parties hereto jointly request that, after hearing, this Court enter its Order finding the settlement to be a fair and equitable resolution of the claims that Plaintiffs have against Defendants and approving the proposed distribution and the terms and conditions of the Release and Settlement Agreement.

Respectfully submitted,

ROTHSTEIN, DONATELLI, HUGHES,
DAHLSTROM & SCHOENBURG, LLP

By: Filed Electronically 3/11/05
Robert R. Rothstein
1215 Paseo de Peralta
Post Office Box 8180
Santa Fe, New Mexico 87501
(505) 988-8004

Attorneys for Plaintiffs

LONG, POUND & KOMER, P.A.

By: Approved by Telephone 3/9/05

John B. Pound

P.O. Box 5098

Santa Fe, NM 87502-5098

(505) 982-8405

Attorneys for Defendants

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